

## Huff, Gwen

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**From:** Jack Hawks [jhawks\_cwa@comcast.net]  
**Sent:** Thursday, August 12, 2010 4:49 PM  
**To:** Water Use Efficiency; Brostrom, Peter N.  
**Cc:** rsk@cpuc.ca.gov; Kevin.Tilden@amwater.com; narmenta@avrwater.com; edeleon@gswater.com; 'Matt Dickens'; 'Jenkins, Ken'; tammie@parkwater.com; Monica.Na@amwater.com; 'Darleen Phares'; 'Pink, Ben'; thtran@sgvwater.com; 'Bob Kelly'; 'Dan Dell'Osa'; dave.stephenson@amwater.com; gmilleman@valenciawater.com; 'Tootle, John'; 'Keith Switzer'; 'Leigh Jordan'; 'Jensen, Palle'; 'R.W.Nicholson'; 'R. J. Diprimio'; 'Smegal, Tom'; 'Catzen-Brown, Meg'; 'Sharun cah2oassn'  
**Subject:** SB7x-7 Urban Conservation Target Methodologies - Public Draft  
**Attachments:** CWA Comment Letter\_Urban Conservation Methodologies\_12August2010.pdf

Attached are the comments of the California Water Association.

*Jack Hawks*  
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\_\_\_\_\_ Information from ESET NOD32 Antivirus, version of virus signature database 5361 (20100812)  
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<http://www.eset.com>

August 12, 2010

Peter Brostrom  
Department of Water Resources  
Water Use & Efficiency Branch  
P.O. Box 942836  
Sacramento, CA 94236



California  
Water  
Association

**RE: Urban Water Use Target Technical Methodologies – Public Draft**

Dear Mr. Brostrom:

On behalf of the California Water Association (CWA), the statewide trade group that represents water utilities regulated by the California Public Utilities Commission (CPUC), I am writing to express CWA's support for the eight urban technical methodologies, developed by the Department of Water Resources (DWR) in consultation with the SB7x-7 Urban Stakeholder Committee (USC) for compliance with the water conservation targets under Senate Bill 7x-7.

Specific comments on the methodologies follow below. Generally, CWA member companies find the draft methodologies to be practical for adaptation to both their CPUC conservation obligations and their forthcoming Urban Water Management Plans (UWMPs). CWA agrees with stakeholder comments that the deadline for the 2015 and 2020 UWMPs should be adjusted so as to allow retail purveyors the opportunity to include accurate compliance daily per capita water use data.

1. Gross Water Use:

- CWA agrees with the step-by-step approach detailed in this methodology, as well the flexibility afforded retail water purveyors in defining and delineating their distribution systems, consistent with application of the rules in the base period and the compliance years.
- CWA believes that the text box containing the definition of "recycled water" should be reinserted (in addition to the reference to subdivision (m) of Sec. 10608.12 of the Water Code.

2. Service Area Population:

- CWA agrees that water suppliers should have the option of revising their population estimates for baseline years between 2000 and 2010 to comport with the 2010 Census information.

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Peter Brostrom  
August 12, 2010  
Page 2 of 3



- While CWA understands DWR's desire for "pure" consistency, it would have preferred that retail purveyors be allowed to use locally developed data similar to what they currently use for their UMWPs and/or methodology used in California Urban Water Conservation Council (CUWCC) gallons per capita per day. As of June 2009, the CUWCC has allowed the following calculation to estimate population for service areas not geographically contiguous with census data: Population = number of service area connections x most recent census data "average number of persons per household (PPH)."
- CWA agrees with the USC observation that the technical report should be revised to more prominently include the persons-per-connection methodology in the service area.

3. Base Daily Per Capita Water Use:

- CWA agrees with all the changes suggested by the USC and accepted by DWR.

4. Compliance Daily per Capita Water Use:

- CWA agrees with the changes made in the Public Draft regarding areas annexed between the baseline and compliance years.

5. Indoor Residential Use: No comment.

6. Landscaped Area Water Use:

- CWA agrees with the USC that water purveyors who cannot separate residential multi-family accounts from the CII multi-unit structures be allowed to apply an adjustment factor determined by DWR.

7. Baseline Commercial, Industrial, Institutional Water Use: No comment.

8. Criteria for Adjustments to Compliance Daily Per Capita Water Use:

- While this methodology won't be finalized until 2011, CWA suggests that DWR, in dealing with compliance year adjustments, consider the forecasting methodology employed by the CPUC for its larger, "Class A" water utilities when normalizing the differences in evapotranspiration and rainfall in the baseline period, compared with the compliance reporting period. As Suburban Water Systems Vice President Bob Kelly noted in his May 25, 2010 comments, the CPUC method uses only two independent variables – temperature and rainfall, and it applies to residential, multifamily and business customer classes.



Peter Brostrom  
August 12, 2010  
Page 3 of 3



- The primary change that CWA would recommend for DWR is that the historical analysis period be shortened to 36 months from the current 120 months (because of the major declines now occurring in water demand, as a result of the drought, the economy and the aggressive promotion and adoption of water conservation).
- CWA is exploring this change with the CPUC now, and it will have additional comments on Methodology 8 at the appropriate time.

9. Regional Compliance:

- CWA agrees with the majority view that individual water purveyors should be able to join more than one regional alliance.
- It further agrees with stakeholder comments that retail water purveyors should not be required to report all regional alliance water use target data in their UWMPs.

Thanks for the giving us the opportunity to comment on the Public Draft.

Sincerely,

A handwritten signature in blue ink that reads "Jack Hawks". The signature is fluid and cursive, with the first name "Jack" and last name "Hawks" clearly legible.

Jack Hawks

cc: Rami Kahlon – CPUC Director of the Division of Water & Audits  
Kevin Tilden – CWA President  
Norma Armenta – Apple Valley Ranchos Water Company  
Edwin DeLeon – Golden State Water Company  
Matt Dickens – Valencia Water Company  
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